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UNITED STATES DISTRICT COURT MAY 0 3 1999

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

CRYSTAL OIL COMPANY AND
CRYSTAL EXPLORATION AND
PRODUCTION COMPANY,
Plaintiffs,

vs.

S

JUDGE STAGG
ATLANTIC RICHFIELD COMPANY,
Defendant.

MAGISTRATE JUDGE PAYNE

## MOTION FOR LEAVE OF COURT TO FILE FINAL REPLY MEMORANDUM

NOW INTO COURT, through undersigned counsel, comes defendant, ATLANTIC RICHFIELD COMPANY ("ARCO" or "defendant"), and respectfully requests leave of court to file ARCO's Final Reply Memorandum in Support of Defendant's Motion to Transfer Case to the United States District Court for the District of Colorado, for the following reasons:

1.

On April 26, 1996, plaintiffs filed their Motion for Leave to File Supplemental Memorandum, with accompanying proposed Supplemental Memorandum in Opposition to Defendant's Motion to Transfer Venue. By Order issued April 29, 1996, the Court granted plaintiffs leave to file the Supplemental Memorandum.



ARCO seeks leave of court to file a reply to plaintiffs' Supplemental Memorandum. As the moving party in this matter, ARCO should be given the opportunity to brief the issues raised by plaintiffs in the Supplemental Memorandum.

3.

The filing of this Final Reply Memorandum will not retard the progress of the suit and is intended to close the briefing in this matter.

WHEREFORE, DEFENDANT, ATLANTIC RICHFIELD COMPANY, PRAYS that the Court issue an Order granting defendant leave of court to file the attached Final Reply Memorandum in Support of Defendant's Motion to Transfer Case to the United States District Court for the District of Colorado.

Shreveport, Louisiana, this <u>32</u> day of May, 1996.

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ATTORNEYS FOR DEFENDANT, ATLANTIC RICHFIELD COMPANY

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA SHREVEPORT DIVISION

CRYSTAL OIL COMPANY AND	§	CASE NO. CV95-2115S
CRYSTAL EXPLORATION AND	Š	
PRODUCTION COMPANY,	§	
Plaintiffs,	§	
	§	
vs.	§	JUDGE STAGG
	§	·
ATLANTIC RICHFIELD COMPANY,	§	
Defendant.	§	MAGISTRATE JUDGE
PAYNE		

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion for Leave to Final Reply Memorandum has been served upon plaintiffs' counsel of record, Osborne J. Dykes, III, Fulbright & Jaworski, 1301 McKinney, Suite 5100, Houston, Texas 77010-3095, and Albert M. Hand, Jr., Cook, Yancey, King & Galloway, P. O. Box 22260, Shreveport, Louisiana 71120-2260, by depositing a copy of same in the U.S. Mail, properly addressed, with adequate postage affixed thereto.

Shreveport, Louisiana, this 3rd day of May, 1996.

OF COUNSEL